

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

ASHINC Corporation, et al.,

Debtor.

Chapter 11

Case No. 12-11564 (CSS)  
(Jointly Administered)

CATHERINE E. YOUNGMAN, LITIGATION TRUSTEE  
FOR ASHINC CORPORATION, ET AL., AS  
SUCCESSOR TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF ASHINC  
CORPORATION, AND ITS AFFILIATED DEBTORS,

Plaintiff,

v.

YUCAIPA AMERICAN ALLIANCE FUND I, LLC,  
YUCAIPA AMERICAN MANAGEMENT, LLC,  
AMERICAN AIRLINES MASTER FIXED BENEFIT  
PENSION PLAN TRUST, AMERICAN PRIVATE  
EQUITY PARTNERS II, LP, AUTOMOTIVE  
MACHINISTS PENSION TRUST, BOARD OF FIRE  
AND POLICE PENSION COMMISSIONERS OF THE  
CITY OF LOS ANGELES, CALIFORNIA PUBLIC  
EMPLOYEES' RETIREMENT SYSTEM,  
CARPENTERS PENSION TRUST FUND FOR  
NORTHERN CALIFORNIA, COLLIER PARTNERS 702  
LP INCORPORATED, CLOUSE S.A., CONSOLIDATED  
RETIREMENT FUND, IAM PRIVATE EQUITY, LLC,  
ILGWU DEATH BENEFIT FUND 4, INTERNATIONAL  
SIF SICAV SA, LOCALS 302 & 612 OF THE  
INTERNATIONAL UNION OF OPERATING  
ENGINEERS – EMPLOYERS CONSTRUCTION  
INDUSTRY RETIREMENT TRUST, LOS ANGELES  
CITY EMPLOYEES' RETIREMENT SYSTEM,  
NATIONAL RETIREMENT FUND, NEW MEXICO  
STATE INVESTMENT COUNCIL, NEW MEXICO  
STATE INVESTMENT COUNCIL LAND GRANT  
PERMANENT FUND, NEW MEXICO STATE  
INVESTMENT COUNCIL SEVERANCE TAX  
PERMANENT FUND, NEW YORK CITY  
EMPLOYEES' RETIREMENT SYSTEM, NEW YORK

Adv. Pro. No. 21-51179

CITY FIRE DEPARTMENT PENSION FUND, NEW YORK CITY POLICE PENSION FUND, NORTHEAST CARPENTERS PENSION FUND, PACIFIC COAST ROOFERS PENSION PLAN, SANBA II INVESTMENT AUTHORITY, STATE STREET BANK AND TRUST COMPANY (AS TRUSTEE ON BEHALF OF AMERICAN AIRLINES MASTER FIXED BENEFIT PENSION PLAN TRUST); STEAMSHIP TRADE ASSOCIATION OF BALTIMORE, INC. – INTERNATIONAL LONGSHOREMEN’S ASSOCIATION (AFL- CIO) PENSION FUND, TEACHERS’ RETIREMENT SYSTEM OF THE CITY OF NEW YORK, UNITED FOOD AND COMMERCIAL WORKERS INTERNATIONAL UNION PENSION PLAN FOR EMPLOYEES, WESTERN CONFERENCE OF TEAMSTERS PENSION TRUST

Defendants.

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**LP DEFENDANTS’ MOTION TO WITHDRAW THE  
REFERENCE PURSUANT TO 28 U.S.C. § 157(d) AND  
FEDERAL RULE OF BANKRUPTCY PROCEDURE 5011**

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The limited partner defendants listed on Exhibit A attached hereto (the “LP Defendants”) in the above-captioned adversary proceeding (the “Adversary Proceeding”), by and through their undersigned counsel, respectfully submit this motion for withdrawal of the reference of the Adversary Proceeding pending in the United States Bankruptcy Court for the District of Delaware pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware.

In support of their motion, the LP Defendants have contemporaneously filed herewith the *LP Defendants’ Opening Brief in Support of Motion to Withdraw the Reference Pursuant to 28 U.S.C. § 157(d) and Federal Rule of Bankruptcy Procedure 5011*.

Dated: March 4, 2022  
Wilmington, Delaware

Respectfully submitted,

By: /s/ L. Katherine Good

Christopher M. Samis (No. 4909)

L. Katherine Good (No. 5101)

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